

PUBLIC INFORMATION RELEASE

UNITED STATES OF AMERICA

v.

Criminal No.

ABDULLAH MUHAMMAD MUSLIM

An indictment was returned today by the Grand Jury for the United States Court for the Southern District of West Virginia meeting at Huntington charging the above defendant(s) with violation of federal law in connection with passport fraud and aggravated identity theft.

Pertinent information concerning the defendant is set forth below:

DEFENDANT'S NAME ABDULLAH MUHAMMAD MUSLIM AGE 37

ADDRESS Columbus, Ohio

MARRIED /☒/Yes /☐/ No Employer (if known) \_\_\_\_\_

INVESTIGATING AGENCY U.S. Department of State Diplomatic Security Service; U.S. Postal Service Office of Inspector General

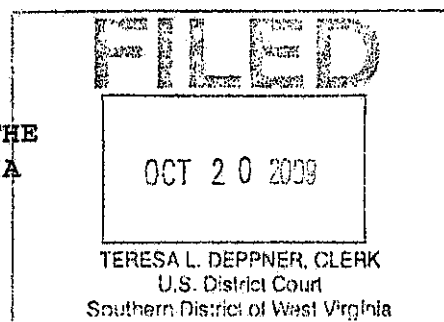
CHARGES 18 U.S.C. §§ 1028A; 1542

POSSIBLE PENALTY 10 years plus a two-year, consecutive mandatory sentence of imprisonment; \$500,000 fine; 3 years SR

CHARLES T. MILLER  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF WEST VIRGINIA

**PLEASE NOTE:** The Fifth Amendment and applicable Federal law gives a criminal defendant a personal right of Indictment by grand jury for Federal crimes punishable by more than one year imprisonment. An Indictment is a formal, written accusation by a grand jury. The defendant may waive the right to an Indictment, and, if waived, a Federal prosecutor may then charge by Information without grand jury involvement. Federal crimes punishable by less than a year imprisonment may be prosecuted by Indictment or by Information.

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
HUNTINGTON GRAND JURY 2009  
OCTOBER 20, 2009 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:09-00232  
18 U.S.C. § 1542  
18 U.S.C. § 1028A

ABDULLAH MUHAMMAD MUSLIM  
aka "JOHN BROWN"

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE  
(Passport Fraud)

On or about June 23, 2009, in Hurricane, Putnam County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant ABDULLAH MUHAMMAD MUSLIM, also known as "John Brown," did willfully and knowingly make a false statement in an application for passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, defendant ABDULLAH MUHAMMAD MUSLIM, also known as "John Brown," falsely completed a DS-11, Application for U.S. Passport, in an attempt to obtain a passport in the name of another person.

In violation of Title 18, United States Code, Section 1542.

COUNT TWO  
(Aggravated Identity Theft)

On or about June 23, 2009, at or near Hurricane, Putnam County, West Virginia, and within the Southern District of West Virginia and elsewhere, defendant ABDULLAH MUHAMMAD MUSLIM, also known as "John Brown," did knowingly possess and use, without lawful authority, the means of identification of another person whose identity is known to the Grand Jury (the "Known Person"), during and in relation to a violation of 18 U.S.C. § 1542, that is, passport fraud, by fraudulently and without authorization using the name and Social Security number of the Known Person to apply for a United States Passport.

In violation of Title 18, United States Code, Section 1028A.

CHARLES T. MILLER  
United States Attorney

By: \_\_\_\_\_

Thomas C. Ryan  
Assistant United States Attorney

PUBLIC INFORMATION RELEASE

UNITED STATES OF AMERICA

v.

Criminal No.

PATRICK B. ANDERSON

An indictment was returned today by the Grand Jury for the United States Court for the Southern District of West Virginia meeting at Charleston charging the above defendant(s) with violation of federal law in connection with Bankruptcy Fraud.

Pertinent information concerning the defendant is set forth below:

DEFENDANT'S NAME PATRICK B. ANDERSON AGE 54

ADDRESS Winfield, WV

MARRIED /\_\_/Yes /X/ No Employer (if known) \_\_\_\_\_

INVESTIGATING AGENCY FBI, US Trustee's Office

CHARGES 18 U.S.C. § 152, 18 U.S.C. § 157

POSSIBLE PENALTY 10 years, \$500,000 fine, 3 years SR

CHARLES T. MILLER  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF WEST VIRGINIA

**PLEASE NOTE:** The Fifth Amendment and applicable Federal law gives a criminal defendant a personal right of Indictment by grand jury for Federal crimes punishable by more than one year imprisonment. An Indictment is a formal, written accusation by a grand jury. The defendant may waive the right to an Indictment, and, if waived, a Federal prosecutor may then charge by Information without grand jury involvement. Federal crimes punishable by less than a year imprisonment may be prosecuted by Indictment or by Information.

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF WEST VIRGINIA  
HUNTINGTON GRAND JURY 2009  
OCTOBER 20, 2009 SESSION

FILED

OCT 20 2009

TERESA L. DEPPNER, CLERK  
U.S. District Court  
Southern District of West Virginia

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:09-00233

18 U.S.C. § 157(1)  
18 U.S.C. § 152(7)  
18 U.S.C. § 2

PATRICK B. ANDERSON

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE  
(Bankruptcy Fraud)

Background

1. At all relevant times, defendant PATRICK B. ANDERSON was a bankruptcy attorney practicing in Winfield, Putnam County, West Virginia.

2. In the Spring of 2007, defendant PATRICK B. ANDERSON represented a married couple known to the Grand Jury (the "Known Couple") in preparing to file a Chapter 7 Voluntary Petition in the Bankruptcy Court for the Southern District of West Virginia.

3. The Known Couple owned a mobile home and lot located on Harmon's Creek Road in Putnam County, West Virginia.

4. To avoid disclosure in the imminent bankruptcy proceeding, defendant PATRICK B. ANDERSON advised the Known Couple

to transfer their home to their daughter before filing the bankruptcy petition.

5. Based upon his advice, the Known Couple agreed and paid defendant PATRICK B. ANDERSON \$150 to prepare the deed of conveyance in February 2007.

6. On or about April 30, 2007, defendant PATRICK B. ANDERSON filed the deed of conveyance fraudulently transferring the Known Couple's home to their daughter.

7. On or about May 1, 2007, defendant PATRICK B. ANDERSON filed a Voluntary Petition for Bankruptcy (the "Petition") on behalf of the Known Couple in the Bankruptcy Court for the United States District Court for the Southern District of West Virginia ("Bankruptcy Court") under Title 11, United States Code.

8. The Petition, prepared by defendant PATRICK B. ANDERSON, failed to include the Known Couple's home on Schedule A, Real Property, or otherwise disclose the property transfer.

#### Scheme to Defraud

9. From on or about February 16, 2007 until on or about May 23, 2007, defendant PATRICK B. ANDERSON did knowingly devise and intend to devise a scheme and artifice to defraud the Known Couple's creditors and the United States Bankruptcy Court ("the scheme").

#### Purpose of the Scheme

10. The purpose of the scheme was for defendant PATRICK B. ANDERSON to conceal certain assets, namely the Known Couple's home

located on Harmon's Creek Road in Putnam County, West Virginia, from the bankruptcy trustee so as to deprive the Known Couple's creditors of receiving payment for unsecured claims.

Manner and Means of the Scheme

11. It was a part of the scheme that in February 2007, defendant PATRICK B. ANDERSON prepared a deed transferring the Known Couple's home to their daughter for the sole purpose of concealing their ownership of the property from the bankruptcy trustee and their creditors.

12. It was further part of the scheme that on April 30, 2007, defendant PATRICK B. ANDERSON filed a deed transferring the Known Couple's home to their daughter for the sole purpose of concealing their ownership of the property from the bankruptcy trustee and their creditors.

13. It was further part of the scheme that on May 1, 2007, defendant PATRICK B. ANDERSON would and did fail to disclose the transfer of the Known Couple's home as required by Item 10, Statement of Financial Affairs, which was filed with the Petition and requires debtors to list all transfers within a year preceding the Petition filing date.

14. It was further part of the scheme that on May 1, 2007, defendant PATRICK B. ANDERSON would and did fail to include the Known Couple's home on Schedule A , Real Property, of the Petition, when in truth and in fact, the transfer of said property was merely a sham transaction aimed to conceal assets from the bankruptcy

trustee and the Known Couple's creditors.

False Filing in Execution of the Scheme

15. On or about May 1, 2007, in Charleston, Kanawha County, West Virginia, in the Southern District of West Virginia, having devised and intending to devise the above-described scheme and artifice to defraud and for the purpose of executing the above-described scheme and artifice to defraud, defendant PATRICK B. ANDERSON knowingly filed a false petition on behalf of the Known Couple under title 11, United States Code, that is, the Petition, Schedules and Statement of Financial Affairs omitted the Known Couple's home and the recent transfer thereof, notwithstanding that defendant PATRICK B. ANDERSON prepared the deed transferring said property.

In violation of Title 18, United States Code, Section 157(1).

COUNT TWO  
(Fraudulent Transfer and  
Concealment of Assets)

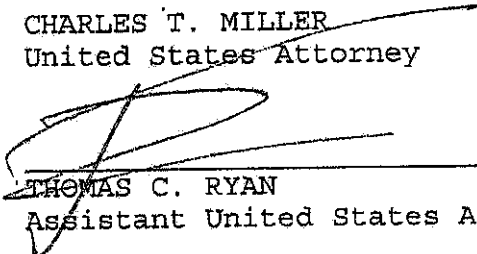
1. The Grand Jury re-alleges paragraphs One through Fourteen of Count One of this Indictment as if fully set forth herein.

2. From on or about May 1, 2007 until on or about May 23, 2007, at or near Charleston, Kanawha County, West Virginia in the Southern District of West Virginia, in a personal capacity and as an agent of the Known Couple in contemplation of a case under title 11 by the Known Couple, with the intent to defeat the provisions of title 11, defendant PATRICK B. ANDERSON, aided and abetted the Known Couple in the knowingly and fraudulently transfer and concealment of the property of the Known Couple, that is, a mobile home and lot located on Harmon's Creek Road, Putnam County, West Virginia.

In violation of Title 18, United States Code, Section 152(7) and 2.

CHARLES T. MILLER  
United States Attorney

By:

  
THOMAS C. RYAN  
Assistant United States Attorney